

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and FACEBOOK,
INC.,

Defendants.

CIVIL ACTION NO. 1:04-cv-11923
(DPW)

District Judge Douglas P.
Woodlock

Magistrate Judge Robert B.
Collings

MARK ZUCKERBERG and
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**MOTION FOR LEAVE TO FILE PLAINTIFF CONNECTU LLC'S REPLY
TO FACEBOOK DEFENDANTS' RESPONSE TO
CONNECTU'S "FORENSIC RECOVERY" ARGUMENTS**

Plaintiff ConnectU hereby moves for leave to file a reply to Facebook
Defendants' Response to Connectu's "Forensic Recovery" Arguments.

As grounds for this motion, a reply brief is necessary to correct new issues in
Facebook Defendants' Response, namely Facebook Defendants' submission of a

declaration from expert engaged after the March 3, 2006 hearing, and to clarify the record for the Court.

Plaintiff's reply, filed concurrently herewith, will assist the Court in ruling on the outstanding forensic discovery issues.

CERTIFICATION UNDER L.R. 7.1

Plaintiff's counsel hereby certifies under L.R. 7.1 that Margaret A. Esquenet, counsel for Plaintiff, conferred with Robert Nagel (counsel for the Facebook Defendants) but Facebook Defendants did not consent to this motion. Counsel for Defendant Saverin did not respond to the request.

DATED: April 10, 2006

/s/ John F. Hornick
Lawrence R. Robins (BBO# 632610)
Jonathan M. Gelchinsky (BBO# 656282)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
55 Cambridge Parkway
Cambridge, MA 02142
Telephone: (617) 452-1600
Facsimile: (617) 452-1666
larry.robins@finnegan.com
jon.gelchinsky@finnegan.com

John F. Hornick (*pro hac vice*)
Margaret A. Esquenet (*pro hac vice*)
Troy E. Grabow (*pro hac vice*)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
901 New York Avenue N.W.
Washington, DC 20001
Telephone: (202) 408-4000
Facsimile: (202) 408-4400

Attorneys for Plaintiff and Counterclaim
Defendant

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on

April 10, 2006.